EXHIBIT A

EXHIBIT A

	FILED
	DATE: September 23, 2024
	TIME: 12:54:53 PM DURHAM COUNTY
1	NORTH CAROLINA SUPERIOR COURT COUNTY OF DURHAM CLERK OF SUPERIOR COURT
2	BY: taner, emre
3	DANIEL LE L'ATOU
4	DANIELLE HATCH 24CV008487-310
5	Plaintiff, PAUPER
6	VS.
7	Defendant COMPLAINT for MALICIOUS PROSECUTION,
8	AT&T SLANDER, LIBEL AND INTENTIONAL
و	INFLICTION OF EMOTIONAL DISTRESS.
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13	COMES NOW Plaintiff DANIELLE HATCH, Petitioner herein, pro se respectfully petitions. The
14	petition alleges and states the following,
15	(a) THAT NC GENERAL STATUES §1-75.4 recognizes that North Carolina Courts are the proper venue
16	for this motion and has personal jurisdiction over the matter.
17	1. Plaintiff Danielle Hatch is a resident of Durham County who, at all times relevant to this Complaint,
18	has suffered harm as a direct result of Defendants' actions.
19	2. Defendant AT&T, Inc. is a telecommunications company headquartered in Dallas, Texas, and
20	conducting business in North Carolina. At all times relevant, AT&T acted through its agents, employees, and
21	representatives,
22	FACTUAL BACKGROUND
23	
24	5. On or about 12/23/2023 Defendant AT&T, acting through its agents, wrongfully accused Plaintiff
25	Danielle Hatch of Identity Theft of namely Marcie Davis and Obtaining Property Under False Pretenses.
26	6. AT&T initiated criminal charges against Plaintiff, despite having no probable cause to believe Plaintiff
27	had committed the alleged crimes
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- 7. Plaintiff was subsequently arrested based on the charges filed by AT&T, leading to her public humiliation. Plaintiff's arrest was publicized, including the publication of her mugshot online and in the media thereby subjecting her to irreversible widespread slander and libel.
- 8. The criminal charges filed by AT&T were eventually dismissed and the Court found there was no probable cause to support the allegations.
- 9. As a result of her wrongful arrest, Plaintiff suffered from severe emotional distress, including a panic attack upon her arrest that required her to be hospitalized for anxiety and trauma.
- 10. Plaintiff was also forced to pay a bond to secure her release, which created a significant financial burden during a time of financial hardship. Plaintiff suffered financial losses, including but not limited to loss of income, fees, and bond payment.
- 11. The wrongful charges and malicious actions of AT&T caused Plaintiff irreparable harm, including reputational damages, emotional distress, and financial losses.
- 12. Plaintiff has endured public embarrassment and continues to suffer from the emotional and psychological effects of the arrest and the malicious prosecution by AT&T.

CLAIMS FOR RELIEF

COUNT ONE: MALICIOUS PROSECUTION

- 13. Plaintiff incorporates the allegations contained in paragraphs 1-12 as though fully set forth herein.
- 14. Defendant AT&T maliciously initiated criminal charges against Plaintiff without probable cause, causing her to suffer arrest, detention, and the resulting emotional, mental and financial harm
 - 15. The charges were dismissed, and the proceedings terminated in favor of Plaintiff.
- 16. As a direct and proximate result of Defendant's malicious prosecution, Plaintiff has suffered significant emotional distress, reputational harm, and financial losses.

COUNT TWO: SLANDER AND LIBEL

- 17. Plaintiff incorporates the allegations contained in paragraphs 1-12 as though fully set forth herein.
- 18. Defendant AT&T, through its agents, falsely accused Plaintiff of criminal conduct, publishing these accusations both verbally and in written form.

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- 19. The publication of Plaintiff's mugshot and the allegations against her constitutes libel and slander, causing damage to Plaintiff's reputation and public image.
- 20. Defendant's false accusations were widely disseminated, leading to Plaintiff's public embarrassment and reputational damage.
- 21. As a result of Defendant's actions, Plaintiff has suffered and continues to suffer emotional distress, embarrassment, and economic losses.

COUNT THREE: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

- 22. Plaintiff incorporates the allegations contained in paragraphs 1-12 though fully set forth herein.
- 23. Defendant AT&T's actions, including falsely accusing Plaintiff of criminal conduct, initiating a wrongful prosecution, and causing Plaintiff's public embarrassment, were intentional, outrageous, and reckless.
- 24. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered severe emotional distress including anxiety, panic attacks, and the need for medical treatment.

COUNT FOUR: NEGLIGENCE

- 25. Plaintiff incorporates the allegations contained in paragraphs 1-12 as though fully set forth herein.
- 26. Defendant AT&T owed a duty of care to Plaintiff to refrain from filing false and baseless criminal charges without probable cause.
- 27. Defendant breached that duty by negligently filing false charges against Plaintiff, resulting in her wrongful arrest and the harm she suffered.
 - 28. As a result of Defendant's negligence, Plaintiff has suffered emotional, reputational, and financial harm.

DAMAGES

29. As a direct and proximate result of Defendant AT&T's actions, Plaintiff has suffered and continues to suffer from (a)- Emotional distress and psychological trauma, including anxiety and depression- Public humiliation, slander, and damage to her reputation;

FILED
DATE: September 23, 2024

STATE OF NORTH CAROLINA DURHAM C	OUNTY 24CV008487-310
CLERK OF	SUPERIOR COURT _{In The General Court Of Justice}
Di. lailei, el	mre District Superior Court Division
Name And Address of Plaintiff 1. Dounielle HOICH	
201 Residence INN BIVD JUNETUAL	
Durham, NC 27713	GENERAL
Name And Address Of Plaintiff 2	CIVIL ACTION COVER SHEET
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v,	
	Duran and Duran State and
VERSUS	Rule 5(b) of the General Rules of Practice for the Superior and District Courts Name And Address Of Attorney Or Party, If Not Represented
Name And Address Of Defendant 1	(complete for initial appearance or change of address)
1-17-T-10	
CT copration system charistored agents to hime Lake RD suite 200	
160 Mine Lake RU Suite 200	
Summons Submitted,	Telephone No. Cellular Telephone No.
Yes No	
· · · · · · · · · · · · · · · · · · ·	NC Attorney Bar No. Attorney Email Address
Name And Address Of Defendant 2	
	☐ Initial Appearance in Case ☐ Change of Address
	Name Of Firm Fax No.
	Counsel For
Summons Submitted	All Plaintiffs All Defendants Only: (list party(ies) represented)
☐ Yes ☐ No	
Jury Demanded In Pleading Com	plex Litigation Stipulate to Arbitration
	PLEADING
(check all that apply)	
Amend (AMND)	Failure To State A Claim (FASC)
Amended Answer/Reply (AMND-Response) Amended Complaint (AMND)	Implementation Of Wage Withholding In Non-IV-D Cases (OTHR) Improper Venue/Division (IMVN)
Assess Costs (COST)	Including Attorney's Fees (ATTY)
Answer/Reply (ANSW-Response) (see Note)	Intervene (INTR)
Change Venue (CHVN)	Interplead (OTHR)
Complaint (COMP)	Lack Of Jurisdiction (Person) (LJPN)
Confession Of Judgment (CNFJ)	Lack Of Jurisdiction (Subject Matter) (LJSM)
- Consent Order (CONS) Consolidate (CNSL)	Modification Of Child Support In IV-D Actions (MSUP) Notice Of Dismissal With Or Without Prejudice (VOLD)
Contempt (CNTP)	Petition To Sue As Indigent (OTHR)
Continue (CNTN)	Rule 12 Motion In Lieu Of Answer (MDLA)
Compel (CMPL)	Sanctions (SANC)
Counterclaim (CTCL) Assess Court Costs	Set Aside (OTHR)
Crossclaim (list on back) (CRSS) Assess Court Costs	Show Cause (SHOW)
☐ Dismiss (DISM) Assess Court Costs ☐ Exempt/Waive Mediation (EXMD)	Transfer (TRFR) Third Party Complaint (list Third Party Defendants on back) (TPCL)
Extend Statute Of Limitations, Rule 9 (ESOL)	Vacate/Modify Judgment (VCMD)
Extend Time For Complaint (EXCO)	Withdraw As Counsel (WDCN)
Fallure To Join Necessary Party (FJNP)	Other (specify and list each separately)
	The first the second se

sheet. For subsequent ming (AOC-CV-753) cover sheet.

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	dministrative Appeal (ADMA) ppointment Of Receiver (APRC) ttachment/Garnishment (ATTC) laim And Delivery (CLMD) ollection On Account (ACCT) ondemnation (CNDM) ontract (CNTR) iscovery Scheduling Order (DSCH)) e (MDML) MSTL) YO) · Vehicle (MVNG)	Product Liability (PROD) Real Property (RLPR) Specific Performance (SF Other (specify and list each	•
FEE: Asse Subs	S IN G.S. 7A-308 APPLY ert Right Of Access (ARAS) estitution Of Trustee (Judicial Foreclosure) blemental Procedures (SUPR)	(RSOT)			
PRO	HAC VICE FEES APPLY on For Out-Of-State Attorney To Appear I	n NC Courts In A Civil O	r Criminal Matter (Out-O	-State Attorney/Pro Hac Vice F	ee)
No.	☐ Additional Plaintiff(s)		•		
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No.	Additional Defendant(s)	Third Party Defe	ndant(s)	·	Summons Submitted
					Yes No
				<u></u>	Yes No
		· · · · · · · · · · · · · · · · · · ·			Yes No
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Defend	dant(s) Against Whom Crossclaim Asserted			e je se Milione i Sterne i Andrea. Postava se	ung arti. Tau
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AOG	C-CV-751, Side Two, Rev. 3/19				en e

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STATE OF NORTH CAROLINA	File No. 24CV008487-310
Ducham County	In The General Court Of Justice ☐ District ☐ Superior Court Division
Neme Of Piaintiff Doniclic Hatch 201 Residence Im Blud Suite 922 City, State, Zip Ducham NC 27113	CIVIL SUMMONS ALIAS AND PLURIES SUMMONS (ASSESS FEE)
VERSUS	G.S. 1A-1, Rules 3 and 4
ATRT THE LCT Corporation System (Registered op) LCD Mine Lake RD Suite 200 Rebioth, MC 27615	Date Original Summons Issued Date(s) Subsequent Summons(es) Issued
To Each Of The Defendant(s) Named Below:	
Name And Address Of Defendant 1 AT & T TLC CT COMPORESTON SUSTEM CRegistered Agost 160 Mine Lake RD Suite 1200 Railerah, NC 271615	Name And Address Of Defendent 2
You have to respond within 30 days. You may possible, and, if needed, speak with someone [IMPORTANTE! ¡Se ha entablado un proceso ¡NO TIRE estos papeles! Tiene que contestar a más tardar en 30 días. ¡	ers are legal documents, DO NOT throw these papers out! want to talk with a lawyer about your case as soon as who reads English and can translate these papers! civil en su contra! Estos papeles son documentos legales. Puede querer consultar con un abogado lo antes posible con alguien que lea inglés y que pueda traducir estos
A Civil Action Has Been Commenced Against You!	
You are notified to appear and answer the complaint of the plaintiff a	s follows:
	aintiff or plaintiff's attorney within thirty (30) days after you have been plaintiff or by malling it to the plaintiff's last known address, and Court of the county named above.
Name And Address Of Plaintiff's Attorney (if none, Address Of Plaintiff)	Date Issued Time
Danielle Hotell 201 Residence Inn Blud Suite 922	9/23/2024 1:03:33 PM AM PM
Durham, HC 27713	Signature Emre Taner
	Deputy CSC Assistant CSC Clerk Of Superior Court
	•
ENDORSEMENT (ASSESS FEE) This Summons was originally issued on the date indicated	Date Of Endorsement Time AM PM
above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is	Signature
extended sixty (60) days.	Deputy CSC Assistant CSC Clerk Of Superior Court
NOTE TO PARTIES: Many counties have MANDATORY ARBITRATION less are heard by an arbitrator before a trial. The parties of the p	orograms in which most cases where the amount in controversy is \$25,000 or tiles will be notified if this case is assigned for mandatory arbitration, and, if
	ver)
AOC-CV-100, Rev. 12/23 © 2023 Administrative Office of the Courts	

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		RETUR	N OF SERVICE		10.00 mg
I certify that this Summons and	d a copy of the co	mplaint were red	eived and served a	s follows:	
		DE	ENDANT 1		
Date Served	Time Served	□ AM □ F	Name Of Defenda	nnt	
	L		<u></u>		·
By delivering to the defend	lant named above	a copy of the si	ummons and compl	aint.	i
By leaving a copy of the superson of suitable age and			lling house or usual	I place of abode of the defend	dant named above with a
As the defendant is a corpubelow.	oration, service w	as effected by de	elivering a copy of t	he summons and complaint t	to the person named
Name And Address Of Person W	filh Whom Copies Left	(if corporation, give to	ille of person copies left v	with)	
			!	•	
			10		·
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□ Assestance of convice	• •		Date Accepted	Signature	
Acceptance of service. Summons and complaint r	eceived by:	Defendant 1. i	_		
Other: (type or print name)	,				
Other manner of service (s	pecify)		<u>+</u>		
- ;	,				
☐ Defendant WAS NOT serv	red for the following	or reason.			
	ica for the following	ig /0000ii.			
		DEI	ENDANT 2		
Date Served	Time Served		Name Of Defende	ant	
	i				
By delivering to the defend	lant named above	e a conv of the si	ummons and compl	aint	
By leaving a copy of the su	ummons and com	plaint at the dwe		I place of abode of the defen	dant named above with a
person of suitable age and		-			
As the defendant is a corp below.	oration, service w	as effected by d	elivering a copy of t	the summons and complaint	to the person named
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			Date Accepted	Signature	
Acceptance of service. Summons and complaint r	eceived by:	Defendant 2.	Cale Acceptor	Organitare	
Other: (type or print name)				•	
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Other manner of service (s	вресну)	• •		,	
☐ Defendant WAS NOT serv	ved for the following	ou teason.			
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Service Fee Paid	***************************************		Signature Of Dep	uty Sheriff Making Return	
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Date Of Return	: ::	 	County Of Sheriff		
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DATE:—September 23, 2024

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STATE OF NORTH CAROLINA DURHAM C	DUNTY	24CV008487-310
CLERK OF S	SUPERIOR COURT	
County BY: taner, er	-	General Court Of Justice
County B1. tailer, er	☐ District	Superior Court Division
Name Of Plaintiff		
Danielle Hatelt	PETITION T	O PROCEED
VERSUS		
Name Of Defendant	AS AN II	NDIGENT
		0.0 4 440 77 000
AT? TINC. (CT Corporation System)		G.S. 1-110; 7A-228
AFFI	DAVIT	
(check one of the four boxes below)		
Petition To Assert Claims - As a party in the above entitled action,	affirm that I am financially unable to	advance the required costs for the
prosecution of the claims I have asserted. Therefore, I now petition t		
☐ I am an inmate in the custody of the Division of Prisons of the	11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	account, claime at an inage
NOTE TO CLERK: If this block is checked, this Petition must be sub-		sposition provided on the reverse
Petition To File Motions - As a party in the above entitled action	, I aπirm that I am tinancially unable	e to advance the required costs to
file a notice of hearing on a motion. Therefore, I now petition the		
Petition To Appeal - As the individual appellant in the above ent		
the cost for the appeal of this action from small claims to district of	ourt. Therefore, I now petition the (Court for an order allowing me to
appeal this action to district court as an indigent.		
Petition To File Expunction Petition - As the petitioner in the al	ove entitled action, I affirm that I a	m financially unable to advance
the required costs to file an expunction petition. Therefore, I now	petition the Court for an order allow	ving me to file my expunction
petition as an indigent.		
(check one or more of the boxes below as applicable)		
I am presently a recipient of		
Supplemental Nutrition Assistance Program (SNAP/food stan	ps). Temporary Assistance for	or Needy Families (TANE)
	ps). Temporary Assistance it	of Needy Fairlines (TANT).
Supplemental Security Income (SSI).		
I am represented by a legal services organization that has as its pr		
am represented by private counsel working on behalf of such a leg	al services organization. (Attach a le	etter from your legal services attorney
or have your attorney sign the certificate below.)		
Although I am RuteRecore all Salam Although I am Ru	nor am I represented by legal serv	rices, I am financially unable to
advance the costs of মান্ট্রাধনার বিভাগের বিভ		
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SWORN/AFFIRMED AND SUBSCRIBED TO BEFORE ME	4-23-24	
Date Signature of SUPERIOR Taner 9/23/2024 1:01:07 PM	Signature Of Petitioner	4 /
9/23/2024 1:01:07 PM	Dog 000 HOVO	##
Title Of Parana Authorized To Administer Oaths	Name And Address Of Petitioner (type, or pr	rint)
	Danielle Hotelt	
		BIVD 912
Date Commission Expires		
SEAL SEAL COURT ! STATE COURT !	Durham, HC 2771	3
COURT 9		
CERTIFICATE OF LEGAL SERVIC	S/PRO BONO REPRESENT	ATION
I certify that the above named petitioner is represented by a legal se legal services to indigent persons or is represented by private couns	al working on behalf of or under the	a ausnices of such legal services
organization.	or working or benan or or ander the	s adoptions of such legal services
Date	Signature	
	Signature	
Name And Address (type or print)		
OR	DER KANDARINANDER	and the state of t
	construction to a transfer of the construction of the state of the sta	And the second section of the second section is a second section of the second section of the second section s
Based on the Affidavit appearing above, it is ORDERED that:		
the petitioner is authorized to assert claims, to appeal, or file notice	es of hearing or petitions in this ac	tion as an indigent.
the petition is denied.		-
Pat 1 2 Signature	Assistant CSC	Clerk Of Superior Court
MANUAL IN INCOME	Judge	Magistrate (for appeal only)
NOTE TO CLERK: If the petitioner is NOT a recipient of SNAP/food stamps, behalf of legal services, you may ask for additional financial information to de	TANF, SSI or is NOT represented by le	egal services or a private attorney on
behalf of legal services, you may ask for additional financial information to de	termine whether the petitioner is unable	e to pay the costs.
(0	rer)	

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		ORDER - DIV	ISION OF P	RISONS IN	MATES		
The undersigned supe Department of Adult C			that the petition	er is an inma	te in the custo	ody of the Division	of Prisons of the
is not frivolous.				۶			
It is ORDERED that		•		*			
the petitioner is au the petitioner is no the action is dismis	t authorized to sue		ndigent,				
Date	Name Of Superior Cou	t Judge (type or print) .	Signature (of Superior Coun	Judge	
			CERTIFICAT	TION 3			
I certify that this Petitic office or official deposi							l envelope in a post
Date	Signature			Dери	ty csc	Assistant CSC	Clerk Of Superior Court
NOTE: G.S. 1-110(b) pro	vides: "The clerk of s	uperior court shall	serve a copy of th	ne order of disn	nissal upon the	prison inmate."	
		,	, F				

AOC-G-106, Side Two, Rev. 1/23 © 2023 Administrative Office of the Courts

STATE OF NORTH CAROLII	File No. 4CV005487-310
Durham Cou	In The General Court Of Justice District Superior Court Division
Name Of Plaintiff(s) VERSUS Name Of Defendant	AFFIDAVIT OF SERVICE OF PROCESS BY REGISTERED MAIL CERTIFIED MAIL DESIGNATED DELIVERY SERVICE G.S. 1-75.10(a)(5), (a)(6); 1A-1, Rule 4(j2)
a copy of the summons and complaint are in the above captioned action to (name of perso	
	EFORE ME Signature Of Plaintiff/Attorney Halal
Title Of Person Authorized To Administer Daths NOTAPY PUBLIC Postery Date My Commission Expires 02 17 20 County Where Notarized SEAL	Danielle Hatott
NDER: COMPLETE THIS SECTION	PLETE THIS SECTION ON DELIVERY
Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Article Addressed to: Corporation System Whine Lake Corporation System Suith 200 Kaleign, NC 21615	Agent Addressee Ceived by (Printed Name) SEP 30 2024 Selivery address different from item 1? Yes SES, enter delivery address below: No No No No No No No No No No
9590 9402 8935 4064 6084 32	ce Type ignature ignature Restricted Delivery d Mail® d Mail Restricted Delivery on Delivery Signature Confirmation Signature Confirmation